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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Replacement of Part 90 by Part)

88 to Revise the Private Land)

Mobile Radio Service and)

Modifying the Policies Governing)

PR Docket No. 92-235

has not been designed, tested, nor manufactured. Although transmitter deviation can be reduced, unless receivers are modified, they will not be protected from new adjacent channel activity. The January, 1996, implementation date will not allow our agency adequate time for budget preparation and legislative approval.

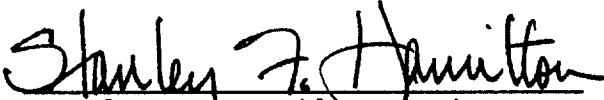
Each wild land fire protection agency cannot do the job alone. We must communicate with our cooperators. The proposed transition period will mean that only those who convert to the new standards will be able to communicate with each other. We are concerned with the loss of interoperability with our federal agency cooperators. We understand they have adopted 6.25 kHz channels vs. your proposed 5 kHz channel spacing.

It appears that Public Safety communications is being down graded through loss of exclusive channel assignments in the 150-174 MHz band. Frequency coordination will become a major problem. The multiple coordinator proposal is fraught with problems as a shared common database and standard set of criteria for assigning frequencies is not existent. Our frequency coordinator, the Forestry-Conservation Communications Association (FCCA), is small enough to be manageable and specialized enough to be highly effective. ~~When record of coordination is without equal~~

elevations will devastate our existing statewide system. Idaho is a state of high mountains and deep river canyons. Our use of mountain top repeaters, with antenna heights many feet above the average terrain will reduce ERP to five watts under the proposal. This will require at least three or four times the present number of repeaters to cover the same area with **reliable** service. The cost to the State of Idaho for all the new sites, if they were available, would be prohibitive.

Forestry-Conservation Communications requires a very high quality of service. We are very concerned with interference and channel congestion. There are many technical areas that do not appear to be feasible at this time. IDL recommends that the Commission work with industry and have workable solutions before mandating change.

Thank you for giving us the opportunity to comment.


Stanley F. Hamilton, Director
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